

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HARVEST OUTREACH MINISTRY, INC.
D/B/A HC-HARVEST CHURCH,
EDWARD RAMIREZ, MELANIE
RAMIREZ, JORDAN RAMIREZ and
JALYSSA FERNANDEZ,

Plaintiffs,

v.

MEGA MANIACS, ROBYN
TORGRIMSON, RIA UNNASCH, DAVID
UNNASCH, CIERA HICKS AND DOES I-
X,

Defendants.

COMPLAINT

Plaintiffs, Harvest Outreach Ministry, Inc. d/b/a HC-Harvest Church, Edward Ramirez, Melanie Ramirez, Jordan Ramirez and Jalyssa Fernandez (collectively referred to as “Plaintiffs”), by and through their attorney, Samuel B. Fineman, Esq. of the law firm Cohen Fineman, LLC, for their Complaint against Defendants, Mega Maniacs, Robyn Torgrimson, Ria Unnasch, David Unnasch, Ciera Hicks and Does I-X (collectively referred to as “Defendants”), allege as follows:

PARTIES

1. Plaintiff, Harvest Outreach Ministry, Inc. d/b/a HC-Harvest Church (hereafter “Harvest Church”), is a non-profit, religious organization located at 204-208 21st Avenue, Paterson, New Jersey 07501.

2. Plaintiff, Edward Ramirez, also known as Dr. Edward Ramirez (hereafter “Dr. Ramirez”), is an adult individual and resident of Rockaway, New Jersey.

3. Plaintiff, Melanie Ramirez, an adult individual, is the spouse of Edward Ramirez and a resident of Rockaway, New Jersey.

4. Plaintiff, Jordan Ramirez, is an adult individual and resident of Rockaway, New Jersey.

5. Plaintiff, Jalyssa Fernadez, is an adult individual and resident of Stanhope, New Jersey.

6. Defendant, Mega Maniacs, is a branded YouTube channel that boasts 3,800 current subscribers and 230,000 views of its videos.

7. On information and belief, Mega Maniacs is owned, operated, controlled, developed and produced by Defendant, Robyn Torgrimson (hereafter “Torgrimson”).

8. Defendant Torgrimson is an adult individual who resides at 11138 Glen Avon Way, Zionsville, Indiana 46077.

9. Defendant, Ria Unnasch, is an adult individual who resides at 300 Sheoah Boulevard, #212, Winter Springs, Florida 32708.

10. Defendant, David Unnasch, Ria Unnasch’s spouse, is an adult individual who resides at 300 Sheoah Boulevard, #212, Winter Springs, Florida 32708.

11. Defendant, Ciera Hicks, is an adult individual who resides at 4231 Brogli Drive, Murfreesboro, Tennessee 37129.

12. Plaintiff Dr. Ramirez is the pastor of Harvest Church, dedicated to promoting the mission of Jesus, finding community and making a difference in the lives of parishioners.

13. According to its YouTube channel, “Mega Maniacs was created to expose abusive and toxic workplaces, much like the creator has personally experienced as an HR Director at a well-known mega church. Mega Maniacs is a gripping podcast that delves into the shadows of

corporate culture to shed light on the pervasive issue of workplace abuse. Join us as we navigate through real-life stories, interviews, and actionable insights to empower listeners to recognize, confront, and combat toxic environments. From psychological manipulation to systemic exploitation, we unravel the layers of workplace abuse and offer strategies for creating safer, healthier work environments for all.”

JURISDICTION AND VENUE

14. The original jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1332 because the parties have complete diversity of citizenship and the amount in controversy exceeds \$75,000.

15. This Court has personal jurisdiction over Defendants Mega Maniacs, Togrimson, Ria and David Unnasch and Hicks, in that, among other things: (a) Defendants are engaged in tortious conduct within the State of New Jersey and in this District, including by making defamatory postings on the Internet directed to Plaintiffs, their parishioners, family and friends in New Jersey; and (b) Defendants’ conduct causes injury to Plaintiffs within the State of New Jersey.

16. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the acts, omissions and events giving rise to the claims asserted in this Complaint occurred in this judicial district.

FACTUAL ALLEGATIONS

17. On September 24, 2024, Mega Maniacs debuted the podcast episode titled “Season Two Episode 11 -Ciera.” See Mega Maniacs Podcast: Season 2 Episode 11 - Ciera,

www.YouTube, <https://www.youtube.com/watch?v=TDSuVCCITUU> (last visited December 11, 2024).

18. On the Mega Maniacs channel, it is claimed that said video has been viewed 5,694 times as of this date.

19. On the introductory page, the episode is teased as follows: “In this powerful and deeply personal episode, we sit down with a Christian college student [Ciera Hicks] who courageously shares her story of surviving abuse at the hands of her boyfriend. But the trauma didn’t stop there—when she sought support from her college and church leadership, she was met with betrayal and silence instead of help. Join us as we explore her journey of healing, how she found strength in her faith despite those who failed her, and what we can do to create safer, more supportive communities within Christian institutions. This is an episode about resilience, faith, and the fight for justice.”

CIERA HICKS

20. At 48 minutes into the podcast, Hicks, in describing a 2015 meeting she had with her parents along with Dr. Ramirez -- who was then Dean of Students at Valor Christian College (hereafter “Valor”) in Canal Winchester, Ohio -- concerning an allegedly abusive relationship Hicks had with her then boyfriend on campus, proclaimed that Dr. Ramirez commented that “sometimes I get a little rough with my wife.”

21. Dr. Ramirez denies making said statement, asserts that said statement is patently false and further denies that he ever had a conversation with Hicks’ parents.

22. In the same podcast at 49 minutes, Hicks insinuates that Dr. Ramirez was in a group of administrators who ultimately invited her alleged abuser back on campus before his suspension was over.

23. Dr. Ramirez denies this claim as he had no part in seeing Hicks' alleged abuser return to campus as he had left Valor by that time.

24. In the podcast at 52 minutes, Hicks claimed that Dr. Ramirez "during an orientation in front of like hundreds of students mocked [her] abuse," and said "[L]et's not have a repeat of last semester and let's not hold our girlfriend's hand too tight okay let's not do that and then laughed."

25. Dr. Ramirez denied ever making such statements to Valor students at orientation.

26. In the podcast at one hour and 10 minutes, Hicks attacks Dr. Ramirez' performance as Dean of Students while at Valor and goes on announce that "he's a graduate of Valor" and "ordained by City Harvest Newark [NJ]," thus signaling Dr. Ramirez' current work location and further noting that Dr. Ramirez "didn't protect [her] when he was the Dean of Students."

27. Dr. Ramirez denies Hicks' contention that he failed to protect her and asserts that the opposite is true. In addition, Dr. Ramirez has various degrees but none from Valor.

28. In the podcast at one hour and 12 minutes, Hicks insinuates that Dr. Ramirez did an "illegal act" in allegedly failing to report to authorities allegations of misconduct that had been reported to him by students.

29. Dr. Ramirez denies Hicks' allegations as false and responds that he never engaged in cover-ups or obfuscation involving student misconduct while at Valor or anywhere else.

30. In the podcast at one hour and 14 minutes, Hicks claims that she had conversations with parishioners of Harvest Church (ostensibly in Paterson, New Jersey), wherein those individuals claimed that at "Ramirez' church ...they swept this and this under the rug,"

implying that Dr. Ramirez continues to allow misconduct to continue at Harvest Church by failing to investigate or ignoring it.

31. Dr. Ramirez takes offense to said allegations, which are false.

32. In the podcast at one hour and 15 minutes, Hicks recounts conversations tagged as “a story” of an alleged Harvest Church parishioner who was assaulted at the church as a minor and Dr. Ramirez brushed these claims “under the rug” and commanded the alleged victim’s parents to “sit down and stop talking about it.”

33. Dr. Ramirez denies that any such conduct, particularly an assault on a minor, was ignored by him as pastor of Harvest Church.

34. In the podcast at one hour and 17 minutes, Hicks asserts that many people are physically scared and intimidated by Dr. Ramirez because “he has a lot of cops in the family.”

35. Dr. Ramirez denies scaring and intimidating others through threats carried out by the police, who do not rank in high numbers in his family.

36. In the podcast at one hour and 18 minutes, Hicks claims that Dr. Ramirez scares and threatens people to the point they feel compelled to relocate, and she further refers to Harvest Church as a “cult.”

37. Dr. Ramirez affirms that neither has anyone left Harvest Church out of fear nor is Harvest Church a “cult.”

38. In the podcast at one hour and 21 minutes, Hicks concludes that Harvest Church is really a business engaged in “conning people” and “covering up crimes ... and letting children and young people be abused and assaulted.”

39. Dr. Ramirez denies these allegations as patently false.

ROBYN TORGRIMSON

40. On the subsequent podcast of Mega Maniacs (Season 2 Episode 12; October 11, 2024), Torgrimson devotes a full episode to the prior episode featuring Hicks, and invites Everett Gagnon (hereafter “Gagnon”) from “Ohio for Freedom” to join her in commenting on Dr. Ramirez’ cease and desist letter of September 26, 2024, which calls out the defamatory statements made by Hicks while appearing on Mega Maniacs.

41. At 19 minutes in the podcast, Torgrimson accuses Dr. Ramirez and Harvest Church of “making threats” and “fear mongering,” ostensibly referring to their efforts to have Torgrimson take down the September 24, 2024 Mega Maniacs podcast due to its defamatory material.

42. At 19 minutes and 31 seconds in the podcast, Torgrimson doubles-down on Hicks’ prior statement and claims that Dr. Ramirez and Harvest Church “knew about children being abused and covered it up.”

43. At 23 minutes and 12 seconds in the podcast, Torgrimson states that Dr. Ramirez and Harvest Church “are very abusive in how they handle and deal with people.”

44. Dr. Ramirez again denies the above claims as patently false.

45. At 24 minutes in the podcast, Gagnon states that there has “been very credible evidence and even screenshots that have been provided about sexual abuse of a minor that happened at your pastor’s Church World Harvest.”

46. Dr. Ramirez denies these allegations and specifically refutes that any such screenshots proving sexual abuse occurred at Harvest Church exist.

47. At 24 minutes and 37 seconds in the podcast, Gagnon goes on to repeat Hicks’ false allegation that Ramirez failed to report allegations of sexual abuse of students at Valor.

48. At 25 minutes in the podcast, Gagnon suggests that a 17-year-old girl was molested at Harvest Church in Paterson, New Jersey, and queries whether such conduct was ever reported to the police and/or if Harvest Church has a policy for vetting church officials with records of sexual offenses.

RIA and DAVID UNNASCH (hereafter “Ria and/or David”)

49. On November 5, 2024, Mega Maniacs debuted the podcast episode titled “Season Two Episode 18 - From Darkness to Light: David and Ria’s Journey of Faith and Freedom. See Mega Maniacs Podcast: Season 2 Episode 18, [www.YouTube, https://www.youtube.com/watch?v=m3c1-HtAoLo](https://www.youtube.com/watch?v=m3c1-HtAoLo) (last visited December 11, 2024).

50. At 10 minutes and 24 seconds in the podcast, Ria and David, who were then unmarried 20-year-olds living in New Jersey in 2010 -- were introduced to Dr. Ramirez at Harvest Church in Paterson and claimed that Dr. Ramirez assumed that they were having pre-marital sex, a claim he denies.

51. At 12 minutes and 23 seconds in the podcast, Ria and David recall Dr. Ramirez’ introduction of the two to the congregation wherein he exclaimed several times to a congregation of over 100 people that Ria was a virgin.

52. Dr. Ramirez denies this claim as completely fabricated.

53. At 13 minutes and 30 seconds in the podcast, Ria and David both recall that Dr. Ramirez commented that after they joined the congregation, he would inquire if she was pregnant and further mentioned that “virgins get pregnant really fast.”

54. Dr. Ramirez denies this ever happened and would never make such statements to a congregation.

55. At 13 minutes and 49 seconds in the podcast, Torgrimson interjects that the kind of behavior Dr. Ramirez displays is objectifying, and his wife, Melanie Ramirez is objectified.

56. Both Plaintiffs Dr. Ramirez and Melanie Ramirez assert that Torgrimson's characterization is false and defamatory.

57. At 15 minutes and 7 seconds in the podcast, Ria and David concur that Dr. Ramirez referred to his ex-wife publicly as "manly" and able to "bench press" him, claims that Dr. Ramirez finds heinous and denies.

58. At 15 minutes and 49 seconds in the podcast, Ria and David expound upon allegedly inappropriate comments Dr. Ramirez made about his sexual life with Melanie Ramirez, along with comments to their son Jordan Ramirez about his mother's derriere. Dr. Ramirez denies making any comments sexualizing his wife or anyone else.

59. At 16 minutes and 35 seconds in the podcast, Ria and David allege that Dr. Ramirez would make sexual comments about his wife, such as "man look at how nice she looks from the back," begging a positive affirmation from a misogynist.

60. Both Dr. Ramirez and Melanie Ramirez find this allegation false, distasteful and designed to harm Dr. Ramirez' reputation as a righteous man.

61. At 17 minutes and 53 seconds in the podcast, Ria claims that Dr. Ramirez was verbally abusive to his wife, Melaine Ramirez.

62. Both Dr. Ramirez and Melanie Ramirez deny this spurious allegation.

63. At 19 minutes and 28 seconds in the podcast, Ria describes an absolutely misogynistic Dr. Ramirez, who is prone to objectifying women and making offensive and demeaning comments about women.

64. In all his years of pastoral care, Dr. Ramirez reports -- and his wife confirms -- that no one has ever affirmed or complained about Dr. Ramirez being a machismo creep or misogynist. These claims are false.

65. At 22 minutes and 44 seconds in the podcast, Ria and David allege that they let their daughter, Jalyssa Fernandez, date at 13, and that Jalyssa's now ex-father-in-law verbally assaulted Ria in a heated argument. Plaintiffs deny these claims as collectively false.

66. At 33 minutes in the podcast, Ria alleges that Melanie Ramirez' best friend's husband, who was affiliated with Harvest Church, was a sexual predator and the church attempted to hush his wrongdoings.

67. Per Plaintiffs, this is a blatant lie.

68. At 52 minutes 27 seconds in the podcast, Ria alleges that Plaintiffs accused her of seducing a man, ruining his marriage, driving him to become incarcerated and she abuses her husband, David. Plaintiffs made no such accusations.

69. At 53 minutes 54 seconds in the podcast, Ria suggests that Dr. Ramirez and Harvest Church have a coterie of crooked police officers at their disposal who will not protect innocents such as Ria and David Unnasch. Plaintiffs deny such fanciful allegations.

70. At 56 minutes in the podcast, Ria submits that Dr. Ramirez and Harvest Church will and have responded to past allegations against them with ominous and chilling threats, going on to suggest that if something untoward were to happen to her as a result of her speaking out, Dr. Ramirez should be investigated. These accusations are blatantly false and defamatory.

71. At an hour in the podcast, Ria accuses Dr. Ramirez of telling her that she married the wrong person -- she should have married Cody -- because she did not listen to the word of God and moved to Ohio to attend Valor. Again, this is a pure fabrication.

72. At an hour and 13 minutes in the podcast, Ria told a story about her relationship with Paul, friend she met through her husband.

73. In relating her story about Paul, Ria posted a picture of her posing in bed with Paul, who was disabled.

74. Ria claims that people associated with Valor verbally crucified her and called her derogatory names, like “whore” for posing in another man’s bed.

75. Plaintiffs deny these fanciful allegations.

76. At an hour and 19 minutes in the podcast, Ria and David related a false story involving their re-unification with Harvest Church after they had left.

77. In said story, Ria and David claim that Dr. Ramirez set-up what was supposed to be a private vow renewal ceremony into a public display before an entire congregation, a tacit warning to others that those who stray from the church shall be held accountable. Plaintiffs oppose the characterization and intention of the vow renewal ceremony and deny that Dr. Ramirez ever made any such veiled threats.

78. At an hour and 25 minutes in the podcast, Ria alleges that Dr. Ramirez and Harvest Church were using the same curriculum that he had developed for Valor Christian College at Harvest Church’s Executive Bible Institute (“EBI”), but charging a discounted price. The gist of the allegation is that Ria and David had already paid tuition at Valor for the same material that Dr. Ramirez was presenting as “new” at EBI. Dr. Ramirez vehemently denies that he copied the Valor curriculum for EBI, which is a completely different program.

79. At an hour and 28 minutes in the podcast, Ria and David depict Dr. Ramirez and Harvest Church’s initiative to build a homeless ministry as a fraud.

80. Ria and David claim that Dr. Ramirez needed roughly \$50,000 to build homeless ministry, which included showers.

81. Instead, Ria and David claim that they donated \$3,000.00 towards the shelter, which, in turn became a party hall that Harvest Church rented out for \$1,000.00 per event.

82. Plaintiffs deny these allegations as false.

83. Showers were built to serve the homeless and the shelter area is not being rented out as a party hall.

COUNT I --DEFAMATION

84. Plaintiffs restate and incorporate by reference, as if fully restated herein, the allegations in Paragraphs 1 through 83, *supra*.

85. Based on the foregoing, Defendants' collective false statements made on the three (3) episodes of Mega Maniacs are *per se* defamatory

86. No one among Plaintiffs, Dr. Edward Ramirez, Melanie Ramirez, Jordan Ramirez or Jalyssa Fernandez, is a public figure.

87. Plaintiffs deny each and every false statement, *supra*, uttered by either Robyn Torgrimson, Ria Unnasch, David Unnasch or Ciera Hicks.

88. All of Defendants' claims, *supra*, regarding Harvest Church, Dr. Ramirez, Melanie Ramirez, Jordan Ramirez or Jalyssa Fernandez are patently false.

89. The defamatory statements made by Defendants Robyn Torgrimson, Ria Unnasch, David Unnasch and Ciera Hicks on the Mega Maniacs podcasts about Plaintiffs have subjected them to ridicule and contempt, have harmed Plaintiffs' personal and professional reputations by lowering the community's estimation of them in the Paterson, New Jersey community, among the viewership of Mega Maniacs and the Harvest Church community.

90. Defendants enjoy no First Amendment or newsworthiness privilege in asserting the patently false and unsupported vitriol, *supra*, levelled against Plaintiffs.

COUNT II – FALSE LIGHT

91. Plaintiffs restate and incorporate by reference, as if fully restated herein, the allegations in Paragraphs 1 through 90, *supra*.

92. Based on the foregoing, Defendants' outrageous and baseless allegations on the Mega Maniacs podcasts depict Dr. Ramirez and his family in a false light.

93. The false light in which Dr. Ramirez and his family was placed, namely that: 1) Dr. Ramirez intentionally covered-up assault and/or sexual abuse allegations at Valor and Harvest Church; 2) Dr. Ramirez abuses his passive wife and is generally a misogynistic bully who makes offensive and demeaning remarks about women and their roles in society; 3) Dr. Ramirez hides behind the cloth, but he and his family appear immoral; 4) Dr. Ramirez and Harvest Church manage a business that is a cult; 5) Dr. Ramirez and Harvest Church use the police to intimidate former church members and others and 6) Dr. Ramirez and Harvest Church defraud their parishioners -- would be highly offensive to a reasonable person.

94. On information and belief, Defendants knew of or acted in reckless disregard as to the falsity of the publicized matter on Mega Maniacs and the false light in which Plaintiffs would be placed by their actions.

95. The false light in which Plaintiffs were placed has exposed them to ridicule and contempt, has harmed Plaintiffs' personal and professional reputations by lowering the community's estimation of them and has jeopardized their standing among the parishioners of Harvest Church and the general Christian community.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, Harvest Outreach Ministry, Inc. d/b/a HC-Harvest Church, Edward Ramirez, Melanie Ramirez, Jordan Ramirez and Jalyssa Fernandez, pray that this Court enter judgment in their favor on each and every claim for relief set forth above and award them relief including, but not limited to, an Order:

1. Preliminarily and permanently enjoining Defendants, Mega Maniacs, Robyn Torgrimson, Ria Unnasch, David Unnasch and Ciera Hicks, from posting anything on the Internet and/or social media relating to Plaintiffs, Harvest Outreach Ministry, Inc. d/b/a HC-Harvest Church, Edward Ramirez, Melanie Ramirez, Jordan Ramirez and Jalyssa Fernandez, that is defamatory or depicts them in a false light.

2. Requiring Defendants, Mega Maniacs, Robyn Torgrimson, Ria Unnasch, David Unnasch and Ciera Hicks, to take down any and all websites and/or social media postings that contain defamatory statements regarding Plaintiffs, Harvest Outreach Ministry, Inc. d/b/a HC-Harvest Church, Edward Ramirez, Melanie Ramirez, Jordan Ramirez and Jalyssa Fernandez, or that depict Plaintiffs in a false light.

3. Awarding Plaintiffs, Harvest Outreach Ministry, Inc. d/b/a HC-Harvest Church, Edward Ramirez, Melanie Ramirez, Jordan Ramirez and Jalyssa Fernandez, monetary relief including damages sustained by them in an amount not yet determined, including actual damages, reputational damages, and/or psychological damages in an amount in excess of \$1,000,000.

4. Awarding Plaintiffs their costs and attorneys' fees in this action.

5. Awarding such other and further relief as this Court may deem just and appropriate.

Plaintiffs demand a trial by jury.

Respectfully submitted,

COHEN FINEMAN, LLC

/s/Samuel B. Fineman

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Counsel for Plaintiffs

Dated: December 12, 2024